

Exhibit A

Irving H. Picard v. ABN AMRO Bank N.V. (presently known as The Royal Bank of Scotland N.V.), et al., No. 10-5354
Comparison Chart of Duplicative Document Requests

Trustee's Proposed Document Requests	March 2009 Rule 2004 Subpoenas ¹ to Royal Bank of Scotland, ABN Amro – Netherlands and ABN Amro ²
(1) "Documents concerning the review, analysis, due diligence, and ongoing monitoring of actual or prospective investments and transactions involving BLMIS, Feeder Funds, or BLMIS-Related Investment Products."	<p>"[A]ny and all documents relating to Madoff" ³ (RBS RFP 19; ABN RFP 20).</p> <p>"All documents that refer or relate to transaction monitoring conducted of Madoff accounts⁴ generated by [Royal Bank of Scotland or ABN Amro]" (RBS RFP 13; ABN RFP 14).</p> <p>"All documents that refer or relate to any accounts that Madoff sought to open or new business relationships that Madoff sought to initiate that were refused for any reason by [Royal Bank of Scotland or ABN Amro]" (RBS RFP 15; ABN RFP 16).</p>

¹ The three subpoenas contain substantially similar requests.

² The definitions and instructions provide that references to Royal Bank of Scotland, ABN Amro, ABN Amro Bank - Netherlands include "any parent, subsidiary, affiliate, division, branch, agency, representative office, predecessor, successor, principal, member, officer, director, shareholder, manager, employee, agent or representative thereof."

³ The definitions and instructions provide that references to "Madoff" include "[BLMIS], its parents, affiliates, representatives and any and all related entities."

⁴ The definitions and instructions provide that references to "account" include "each and every account, borrowing, credit or cash advance facility . . . , deposit, financial instrument, fund, investment property, other property, tangible or intangible, lease, loan, mortgage, note, money or thing of value held, maintained, made or extended by, to or from Madoff in Madoff's name or for Madoff's benefit, or any other person or entity that Madoff owns or controls or on whose behalf Madoff has power or authority or otherwise purports to act, alone or with other persons, or by Madoff for the benefit or use of any other person or entity."

Trustee's Proposed Document Requests	<p style="text-align: center;">March 2009 Rule 2004 Subpoenas¹ to Royal Bank of Scotland, ABN Amro – Netherlands and ABN Amro²</p>
<p>(2) “Documents concerning Defendant(s)’ investment decision, evaluation, approval, disapproval, or ongoing monitoring of any investments or transactions involving BLMIS, Feeder Funds, or BLMIS-Related Investment Products.”</p>	<p>“[A]ny and all documents relating to Madoff . . .” (RBS RFP 19; ABN RFP 20).</p> <p>“All documents that refer or relate to any analyses, review, study, or investigation by any oversight committee, review committee, legal department, risk group, internal audit, compliance department, “know your customer” group, or new account acceptance committee of Madoff for . . . accounts maintained by or for the benefit of Madoff, including accounts for which Madoff had signing authority.” (RBS RFP 12; ABN RFP 13).</p> <p>“All documents that refer or relate to transaction monitoring conducted of Madoff accounts generated by [Royal Bank of Scotland or ABN Amro] . . .” (RBS RFP 13; ABN RFP 14).</p> <p>“All documents that refer or relate to any accounts that Madoff sought to open or new business relationships that Madoff sought to initiate that were refused for any reason by [Royal Bank of Scotland or ABN Amro] . . .” (RBS RFP 15; ABN RFP 16).</p>

Trustee's Proposed Document Requests	March 2009 Rule 2004 Subpoenas ¹ to Royal Bank of Scotland, ABN Amro – Netherlands and ABN Amro ²
(3) "Documents concerning fraud, Ponzi, illegality, front-running, investigations, insolvency, or embezzlement at BLMIS or Feeder Funds."	<p>"[A]ny and all documents relating to Madoff . . ." (RBS RFP 19; ABN RFP 20).</p> <p>"All documents that refer or relate to referrals or reports made by [Royal Bank of Scotland or ABN Amro] to law enforcement, regulators, self-regulatory organizations about Madoff . . . and all documents reflecting decisions to not make such a referral about Madoff . . ." (RBS RFP 14; ABN RFP 15).</p> <p>"All documents that refer or relate to subpoenas served on [Royal Bank of Scotland or ABN Amro] that relate to Madoff, including documents produced in response to the subpoena, investigations initiated as a result of such a subpoena and any other actions taken by [Royal Bank of Scotland or ABN Amro]." (RBS RFP 16; ABN RFP 17).</p> <p>"All documents concerning any complaints received by [Royal Bank of Scotland or ABN Amro] concerning any investments in Madoff." (RBS RFP 17; ABN RFP 18).</p> <p>"All documents concerning any threatened or pending investigation, litigation or arbitration concerning Madoff . . ." (RBS RFP 18; ABN RFP 19).</p>
(4) "Documents concerning fees, rebates, commissions, retrocessions, or any other remuneration paid to or by Defendant(s), related to investments and transactions involving BLMIS, Feeder Funds, or BLMIS-Related Investment Products."	<p>"[A]ny and all documents relating to Madoff . . ." (RBS RFP 19; ABN RFP 20).</p>